

*Attorneys for Defendant Dreamdealers USA LLC d/b/a Exotics Racing*

BHRAC-AC, LLC d/b/a GOTHAM DREAM  
CARS, LLC

Plaintiff,

V.

DREAMDEALERS USA, LLC d/b/a EXOTICS  
RACING

Defendant.

# JOINT STATUS REPORT REGARDING SETTLEMENT NEGOTIATIONS

3. This Waiver was filed with the Court on August 15, 2016. (ECF No. 8).

1           4.       Accordingly, pursuant to Rule 4 of the Federal Rules of Civil Procedure, an answer or  
2 responsive pleading to Plaintiff's Complaint is due sixty (60) days from August 12, 2016, which would  
3 be October 11, 2016.

4           5.       The Parties have engaged in settlement discussions, via written correspondence, and on  
5 August 24, 2016, the Parties, and their respective counsel, personally met and conferred in this matter.

6           6.       During this settlement conference, the Parties reached a tentative settlement agreement  
7 in regards to Plaintiff's Complaint and Defendant's anticipated counterclaims and requests for  
8 injunctive relief.

9           7.       In order to facilitate the Parties' settlement efforts, as well as to minimize attorneys'  
10 fees and other legal expenses, Plaintiff and Defendant agreed that the present civil action should be  
11 stayed for sixty (60) days.

12           8.       On or about September 6, 2016, the Parties filed a Stipulation and Proposed Order to  
13 Stay Proceedings in this Matter (the "Parties' Stipulation"), requesting that the Court enter an Order  
14 staying the matter for a period of sixty (60) days from the date an order on this stipulation is entered  
15 with the Court; and stipulating that nothing in this delay shall prejudice Defendant's right to seek  
16 necessary injunctive relief from this Court and/or to file any relevant counter-claims and/or third-party  
17 claims in this matter. (ECF No. 9.)

18           9.       On September 26, 2016, this Court entered an Order on the Parties' Stipulation, stating  
19 that the Parties shall have until October 11, 2016, to file a stipulation to dismiss if a settlement has been  
20 reached, or a joint status report indicating when the stipulation to dismiss will be filed. If a settlement  
21 has not been reached, Defendant shall have until October 18, 2016, to file an answer or responsive  
22 pleading. *See ECF No. 10.*

23           10.       The Parties have been negotiating the terms of the settlement agreement and require  
24 additional time in doing so, due to the certain principals being unavailable for an extended period of  
25 time.  
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27           11.       Currently, the Settlement Agreement has been drafted and is undergoing review by the  
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Parties. Accordingly, the Parties respectfully request that this Court allow the instant Stay be permitted to continue for an additional thirty (30) days, until November 10, 2016, in order to allow the Parties to come to an anticipated agreed-upon settlement of the instant matter and file a stipulated dismissal regarding the same.

12. If a settlement has not been reached by November 10, 2016, the Parties agree that Defendant shall have until November 18, 2016, to file an answer or responsive pleading to Plaintiff's Complaint.

13. As with the Parties' original Stipulation, the Parties agree that nothing in this delay shall prejudice Defendant's right to seek necessary injunctive relief from this Court and/or to file any relevant counter-claims and/or third-party claims in this matter.

RESPECTFULLY SUBMITTED this 11th day of October, 2016.

**THE AMIN LAW GROUP NV, LTD.**

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**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: October 12, 2016